

228551

LEONARD
STREET
AND
DEINARD

150 SOUTH FIFTH STREET SUITE 2300
MINNEAPOLIS, MINNESOTA 55402
612-335-1500 MAIN
612-335-1657 FAX

DAVID F. RIFKIND
202-346-6918 DIRECT
DAVID.RIFKIND@LEONARD.COM

December 29, 2010

The Honorable Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room #100
Washington, DC 20423-0001

VIA ELECTRONIC FILING

Re: ***Total Petrochemicals USA, Inc. v. CSX Transportation Inc., et al***
STB Docket No. 42121

Dear Ms. Brown:

This Firm represents the Madison Railroad, a Division of the City of Madison Port Authority ("CMPA"), with respect to the above-referenced proceeding. We are writing to request an extension of time for CMPA to file a responsive pleading to Total Petrochemicals USA, Inc.'s ("TPI") Second Amended Complaint and to TPI's Motion to Compel filed December 13, 2010.

As background, CMPA is a short line rail carrier located in Jefferson County, Indiana and operates over approximately 25 miles of track between Madison and North Vernon, Indiana. Historically, CMPA has interchanged a *de minimis* amount of TPI's traffic with CSXT at North Vernon for a plastic bag manufacturing facility that is also located in North Vernon. Although the TPI traffic handled by CMPA is approximately only two to four cars per year, CMPA finds itself in the highly unusual position of being a named defendant in a SAC rate reasonableness case.

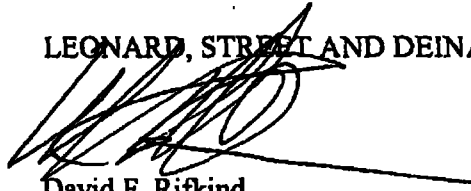
Currently, CMPA is in settlement negotiations with TPI. In the meantime, CMPA respectfully requests that the Board grant an extension of time to Tuesday, January 4, 2011, for CMPA to file responses to the Second Amended Complaint and the pending Motion to Compel, which CMPA inadvertently failed to file when originally due. TPI consents to this request.

December 29, 2010

Page 2

Very truly yours,

LEONARD, STREET AND DEINARD



David F. Rifkind

W. Karl Hansen

cc: Cathy S. Hale, Chief Executive Officer, Madison Railroad
Jeffrey O. Moreno, Counsel for TPI
G. Paul Moates, Counsel for CSXT
Paul A Hemmersbaugh, Counsel for CSXT
Louis E. Gitomer, Counsel for South Carolina Central Railroad Company
Eric Hocky, Counsel for Seminole Gulf Railway, LP and New Hope & Ivyland Railroad
Karl Morell, Counsel for Georgia Woodlands Railroad, LLC
Thomas J. Litwiler, Counsel for Pioneer Valley RR Company
David W. Lawrence, Counsel for Nashville & Eastern R.R. Corp.
G.R. Abernathy, President, Sequatchie Valley Railroad Company
Jeff Collins, General Manager, Mohawk, Adirondack & Northern Railroad Corp.
Lucinda K. Butler, Director, South Branch Valley Railroad
Joe Martin, Division Manager, R.J. Corman Railroad Company (Memphis)